# IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF PUERTO RICO

IN RE:

THE FINANCIAL OVERSIGHT AND MANAGEMENT BOARD FOR PUERTO RICO, as representative of THE COMMONWEALTH OF PUERTO RICO, et al.

Debtors<sup>1</sup>

PROMESA Title III

Case No. 17 BK 3283-LTS

(Joint Administered)

## AMENDED REQUEST FOR LEAVE TO WITHDRAW AS COUNSEL

#### TO THE HONORABLE COURT:

**COMES NOW** the undersigned counsel, Hilda Quiñones Rivera, and respectfully states and prays as follows:

- 1. On April 15, 2019, the undersigned counsel filed a *Notice of Participation*[...] on behalf of John Hancock Investments, Inc. (JHI). [Docket 6268]
- 2. Subsequently, on May 30, 2019, attorneys Roberto Lefranc Morales and Francisco J. Ramos Martínez filed a *Notice of Appearance and Request for Notice* on behalf of the same party; that is, John Hancock Investments, Inc. [Docket 7161].

<sup>&</sup>lt;sup>1</sup> The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); and (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686). (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

- 3. The undersigned attorney has been notified of a potential conflict of interest in her appearance as counsel for JHI, which was notified to JHI in due course. In response, JHI retained new counsel to appear on its behalf in this case, as shown by Docket 7161.
- 4. JHI has been notified of this determination and agrees with the same. The undersigned does not have any files, documents or property of JHI, and there are no pending filings or hearings related to said entity. In consideration thereof, there is not an impediment to grant the requested leave.
- 5. In consideration thereof, the undersigned moved this Court on June 25, 2019, for leave to withdraw as counsel for JHI in this case. [Docket 7628]
- 6. Today, the Court issued *Order Regarding Defective Notice of Withdrawal*. [**Docket 7630**], requiring the undersigned to amend its request for leave in order to tender the notice of appearance of new counsel. See Local Bankruptcy Rule 9010-1(3)(A).
- 7. Attached hereto is the Notice of Appearance filed by attorneys Lefranc-Morales and Ramos. See **Docket 7161**, which is attached hereto and made an integral part hereof as **Exhibit A**.
- 8. Accordingly, the undersigned again seeks leave of this Court to withdraw as counsel in this case. See Local Rule 83D.

WHEREFORE, the undersigned respectfully requests this Honorable Court to allow the undersigned to withdraw as counsel for John Hancock Investments, Inc. in the captioned case and to terminate notice of all filings in relation thereto, effective immediately.

## RESPECTFULLY SUBMITTED.

In San Juan, Puerto Rico, this <u>25<sup>th</sup></u> day of June 2019.

**CERTIFICATE OF FILING**: I hereby certify that on this date, I electronically filed the foregoing documents through the Court's CM/ECF system, which will send notification of such filing to all participating parties in the case.

## Q.R. & ASOCIADOS, LLC

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